

REMARKS

The applicants have carefully considered the Office action dated July 12, 2006, and the references it cites. In the Office action, independent claims 1 and 14 were rejected as anticipated by Cornelius et al. (US 6,684,222). In light of the following remarks, the applicants submit that all claims are allowable and reconsideration is respectfully requested.

As an initial matter, applicants have amended claims 5 and 18 to include a closing period. Therefore, the applicants respectfully request reconsideration of the claim objections.

Claim 1 recites a method comprising, *inter alia*, receiving at least one XML-based message; comparing one or more XML tags within the at least one XML-based message to one or more references, wherein each reference is associated with one or more previous messages; selecting a reference that most closely matches one or more of the XML tags; and converting the received message into a converted message having a format associated with at least one database associated with the matching reference.

While Cornelius is directed to a method and system for translating data associated with a relational database, Cornelius does not describe or suggest comparing one or more XML tags within at least one XML-based message to one or more references, wherein each reference is associated with one or more previous messages. The Office action submits that Cornelius describes such a recitation at a number of locations: Col. 3, lines 49-56; Col. 4, line 65 - Col. 5, line 1; Col. 3, line 39 - Col. 4, line 9; and Col. 5, lines 6-34. As described below, it is respectfully submitted that these portions of Cornelius do not include such a description.

Col. 3, lines 49-56 merely describes that XML documents have parsed entities (in accordance with the XML specification). The mere fact that XML documents have a storage unit that is referred to as “parsed” does not inherently describe any type of comparison.

Col. 4, line 65 – Col. 5, line 1 describes resending messages from a first processing system to a second processing system if an acknowledgment is not received. It is not clear to the applicants how resending messages describes or suggests comparing one or more XML tags within at least one XML-based message to one or more references, wherein each reference is associated with one or more previous messages.

Col. 3, line 39 – Col. 4, line 9 describes receiving XML files, converting the files to a table structure, and storing the table structure in a database, retrieving the table structure from the database, converting the table structure to an XML structure, and transmitting the XML structure from a first data processing system to a second data processing system. The cited

portion describes that a user interface to the database storing the table structure may cooperate with the database to allow querying. However, even if querying a database suggests comparing an XML tag to a reference, a point which the applicants do not concede, Cornelius does not describe or suggest that the query comprises the XML tags of a received XML-based message. Accordingly, it is not clear how the cited portion of Cornelius describes or suggests comparing one or more XML tags within at least one XML-based message to one or more references, wherein each reference is associated with one or more previous messages.

Col. 5, lines 6-34 of Cornelius generally describe querying a first relational database and a second relational database to check for equivalence of the contents of the first relational database and the second relational database. First, even if querying the first relational database and the second relational database to check for equivalence suggests comparing XML tags to one or more references, a point which the applicants do not concede, Cornelius does not suggest that such a query compares the XML tags of a received XML-based message to one or more references. Rather, Cornelius describes that the XML-based message is converted to a tabular structure before insertion in a database. (Col. 3, lines 57-59). Cornelius describes that a received message has already been converted into a converted message prior to performing the query, whereas claim 1 recites that the message is converted to a format associated with the reference that most closely matches one or more of the XML tags. Accordingly, Cornelius does not describe or suggest comparing one or more XML tags within at least one XML-based message to one or more references, wherein each reference is associated with one or more previous messages.

While claim 1 is patentable based on the forgoing arguments, the applicants further respectfully submit that Cornelius does not describe or suggest selecting a reference that most closely matches one or more of the XML tags. In rejecting this claim recitation, the Office action references Col. 3, lines 57-59 and Col. 3, lines 39 – Col. 4, line 9. Col. 3, lines 57-59 states “The mapper 106 converts the hierarchical data structure into a table or another generally tabular data structure for storage in the first relational database 108.” As described in Col. 3, lines 42-46, the hierarchical data structure refers to the received XML file. Accordingly, this portion of Cornelius does not describe or suggest selecting a reference that most closely matches one or more of the XML tags.

Col. 3, line 39 – Col. 4, line 9 describes receiving XML files, converting the files to a table structure, storing the table structure in a database, retrieving the table structure from the

database, converting the table structure to an XML structure, and transmitting the XML structure from a first data processing system to a second data processing system. The cited portion describes querying a database, but does not describe or suggest that such a query may be used to select a reference that most closely matches one or more of the XML tags of a received XML-based message.

Therefore, for at least the forgoing reasons, claim 1 and all claims depending therefrom are in condition for allowance.

Claim 14 recites a system comprising, *inter alia*, a mediation web server operable to: receive at least one XML-based message from at least one of many, different communication devices; compare one or more XML tags within the message to one or more references, wherein each reference is associated with one or more previous messages; select a reference that most closely matches one or more of the XML tags; and convert the received message into a format associated with at least one database associated with the matching reference. For at least the forgoing reasons provided in connection with claim 1, claim 14 and all claims depending therefrom are in condition for allowance.

If there are any remaining matters that the examiner would like to discuss, the examiner is invited to contact the undersigned representative at the telephone number set forth below.

Respectfully submitted,

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